

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

MARY SEGUIN,

*Plaintiff,*

VS.

Civil Action No. 1:23-cv-00034

RHODE ISLAND OFFICE OF CHILD SUPPORT SERVICES in its official capacity; KEVIN TIGHE, MONIQUE BONIN, FRANK DIBIASE, WENDY FOBERT, KARLA CABALLEROS and TIMOTHY FLYNN in their individual and official capacities; GERO MEYERSIEK,

*Defendants*

**PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT**

Pursuant to Fed. Civ. R. P. 55(a), the Plaintiff requests the clerk of the court enter default against defendants Rhode Island Office of Child Support Services, Kevin Tighe, Monique Bonin, Frank DiBiase, Wendy Fobert, Karla Caballeros, and Timothy Flynn, for failure to plead or otherwise defend this action.

On January 30, 2023, a copy of the Complaint and Summons in this action was served by the Rhode Island Sheriff upon the aforesaid defendants, at 77 Dorrance Street, Providence, RI 02903. A copy of the Process Receipt and Return and Summons is attached hereto as Exhibit A and is incorporated herein by reference.

Plaintiff, in Texas, received by regular mail from the Rhode Island Sheriff, then sent back to the Court Clerk by mail, the original Process Receipt and Return and Summons. On February 14, 2023, the aforesaid defendants were served with the Amended Complaint. On March 1, 2023, after more than twenty days had elapsed since the service of the Complaint and Summons, and more than fourteen days since the service of the Amended Complaint, and no Answer thereto having been served by the aforesaid defendants upon the Plaintiff, the Plaintiff

requests the clerk of the court for entry of default against the aforesaid defendants. In support of this request, Plaintiff relies on the record and the affidavit submitted herein.

Respectfully submitted,

March 1, 2023

FOR PLAINTIFF  
MARY SEGUIN, Pro Se.

By: \_\_\_\_\_ /s/ *Mary Seguin*  
Mary Seguin  
P.O. Box 22022  
Houston, TX 77019  
maryseguin22022@gmail.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 1, 2023, I filed the within Request via the ECF filing system and that a copy is available for viewing and downloading.

\_\_\_\_\_  
*Mary Seguin*